

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

Zaziiz S. L. Dinkins

(In the space above enter the full name(s) of the plaintiff(s).)

- against -

Alejandro N. Mayorkas

Secretary,

Department of Homeland Security (DHS)

COMPLAINT

Jury Trial: ☐ Yes ☒ No

(check one)

RECEIVED

MAR - 1 2022

ALAN M. WALSH
CLERK

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

I. Parties in this complaint:

- A. List your name, address and telephone number. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff	Name	<u>Zaziiz S. L. Dinkins</u>
	Street Address	<u>410 Short Hills Drive</u>
	County, City	<u>Gloucester, Mount Royal</u>
	State & Zip Code	<u>NJ 08061</u>
	Telephone Number	<u>646-923-2694</u>

- B. List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1 Name Alejandro N. Mayorkas
 Street Address Office for Civil Rights and Civil Liberties
 County, City U.S. Department of Homeland Security
 State & Zip Code Washington, D.C. 20528

Defendant No. 2 Name _____
 Street Address _____
 County, City _____
 State & Zip Code _____

Defendant No. 3 Name _____
 Street Address _____
 County, City _____
 State & Zip Code _____

Defendant No. 4 Name _____
 Street Address _____
 County, City _____
 State & Zip Code _____

II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. There are four types of cases that can be heard in federal court: 1) Federal Question - Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case; 2) Diversity of Citizenship - Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case; 3) U.S. Government Plaintiff; and 4) U.S. Government Defendant.

- A. What is the basis for federal court jurisdiction? (check all that apply)

☐ Federal Questions

☒ Diversity of Citizenship

☐ U.S. Government Plaintiff

☒ U.S. Government Defendant

- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue? N/A

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship Washington, D.C.

Defendant(s) state(s) of citizenship New Jersey

III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? Federal Emergency Management Agency (FEMA), Mission Support Division, 1 World Trade Center, Floor 52, New York, NY 10007

B. What date and approximate time did the events giving rise to your claim(s) occur? Between April 4, 2018, and December 18, 2019.

C. Facts: At FEMA, Region 2, Mission Support Division, I faced illegal harassment, discrimination, and a hostile work environment that was so offensive, severe, and pervasive it altered the condition of my employment. The discriminatory conduct and illegal harassment continued for over a year and any reasonable person would have considered the behavior as demeaning, embarrassing, humiliating, intimidating, hostile and abusive. When I came into work, the FEMA Mission Support Director, Tasha Coleman, made hurtful, disparaging, and insulting remarks to me; at other times she ignored me; she isolated me from my co-workers; excluded me from meetings; took my work and reassigned it to her secretary; and retaliated against me when I filed a complaint. This showed a lack of respect toward me when we we should have been working as a team, and this in turn affected my self-esteem, my mental health, my morale, and my job performance. By her conduct she created a polarizing, discriminatory, hostile work environment.

No one else was involved.

My co-workers Tiffany Lowe, Valrie Tracey, Deborah Piserchia, and Marcia Edwards saw what happened. My husband Daryl, and two daughters, Shahnaz and Khazzmirah saw the the impact of the embarrassment, humiliation, and stress, and the pain and suffering I endured.

IV. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received. The injuries sustained were mental impairments that affected my mental health, my selfesteem, my morale and my job performance. As a service connected disabled veteran, the treatment I received included my discussion at length with an evaluator at a VA clinic in the Bronx, NY and with my mental health provider at the VA Hospital in Manhattan. I also go to the mental health outpatient clinic once every three months.

V. Relief:

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation.


I would like the court to hold DHS/FEMA liable because they allowed these actions to be taken against me intentionally by Tasha Coleman even though I am in a protected group;

I would like the court to direct DHS/FEMA to hold Tasha Coleman accountable by taking the appropriate disciplinary action against her so that she doesn't get to do this to anyone else in the future; and I would like to be compensated in the amount of \$300,000 for the impact the entire experience had on my mental health and well being, which includes the duration of time I had to endure the embarrassment, the humiliation, and the pain, and suffering.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 28th day of February, 2022.

Signature of Plaintiff



Mailing Address 410 Short Hills Drive

Mount Royal, NJ

08061

Telephone Number 646-923-2694

Fax Number (if you have one) _____

E-mail Address zaziizdinkins@yahoo.com

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint.

Signature of Plaintiff:

